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May 24, 2011

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Ms. Felicia Jackson
Cost recovery Specialist
U.S. Environmental Protection Agency, Region 4
Superfund Enforcement and Information Management Branch
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303-8909

Re: Request for Information Pursuant to Section 104€ of CERCLA and
Section 3007 oOf RCRA for the Wright Chemical Corporation Superfund
Site in Riegelwood, Columbus County, North Carolina (Site #A4XW)

Dear Ms. Jackson:

Reference is made to the letter submitted by this office in behalf of William Gilchrist Wright Properties, Inc. dated May 4, 2011.

We have now received a compact disk containing copies of the documents from Oak-Bark Corporation said to be the relevant documents from the records of the Wright Chemical Corporation records which were delivered to Oak-Bark upon the sale of assets of the chemical operations and the plant site. As promised, a copy of the compact disk is enclosed with this letter.

After a review of the documents, some of the responses previously provided require amendment. Accordingly, William Gilchrist Wright Properties, Inc., Respondent, submits the following Amended Responses to the Request for Information:



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3. For each Question herein, identify all documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.

Response:

In addition to the Asset Purchase Agreement, the compact disk provided by Oak-Bark Corporation has been reviewed with all documents therein contained. A copy of the compact disk is enclosed herewith.

5. If you are not the owner and/or operator of the Site, state the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including, but not limited to purchase and sale agreements, deed, leases, indemnification documents, etc.

Response:

The compact disk contains a number of deeds relating to various portions of the overall plant site, which deeds were among the records of Wright Chemical Corporation delivered to Oak-Bark upon purchase of assets.

11. Provide information about the Site, including but not limited to the following:

- a. Property boundaries, including a written legal description;
- b. Location of groundwater wells or underground utilities (telephone, electrical, sewer, water main, etc.);
- c. Storm water drainage system or sanitary sewer system, including septic tank(s), subsurface disposal field(s), and other underground structures and where, when and how such systems emptied;
- d. All maps and drawings of the Site in your possession.

Response:

The compact disk includes a number of deeds covering portions of the total tracts comprising the plant site. The maps and drawing on the disk are all of the maps and drawings in the possession of Respondent.

17. Describe all current and past arrangements or contractual relationships that you have or had with the following entities: Heck Sealant, Hexion Specialty Chemicals, Oak-Bark Corporation, Kaiser Aluminum & Chemical Corporation, Acme Chemicals, Inc. and Koch Sulfur Products Company.

Response:

Based upon the deeds included on the compact disk provided by Oak-Bark, it appears that Acme Chemicals, Inc. was a prior name of Wright Chemical Corporation. This amendment is added to the previous Response.

Respondent will make additional supplemental responses as information becomes available to it.

Sincerely,

MARSHALL, WILLIAMS & GORHAM, LLP

By: 
Lonnie B. Williams

Cc: William Gilchrist Wright Properties, Inc.